



May 10, 2011

**TO:** GPT MAP TEAM

**FROM:** Cyrilla Cook, Washington State Department of Natural Resources, Policy Unit Supervisor

**SUBJECT:** Baseline Investigation Protocols for the Marine Environment as presented April 28, 2011

The following comments are submitted in response to the Marine Environment presentation to the MAP Team on April 28, 2011. We look forward to reviewing the proposed study sampling protocols in coordination with other MAP Team agencies. Our scientists are available to assist with this review and answer any questions you might have.

1. The Baseline Investigation as shown in slide 8 of the Marine Environment presentation shows a consolidated study area that combines both potential wharf and trestle locations. However, the proposed location of the qualitative and quantitative surveys for marine biota shown in slide 17 of the same presentation shows the marine biota surveys only covering the alternative configuration, not the consolidated area. The surveys for marine biota should use the consolidated study area as it is currently unknown which configuration will be used.
2. The reference area should be situated outside of the consolidated study area. This would avoid the need to move the reference area and complete a new baseline study in the event that the original configuration is used. To ensure an accurate comparison during impact monitoring,, the reference site should be extended waterward to the same tidal elevation as the study site.
3. The presenter proposes that the quantitative survey of aquatic vegetation provide identification at the genus level. The quantitative survey should provide identification to the species level for kelp (macroalgae in the Order Laminariales) and seagrasses. The Cherry Point reach contains a high diversity of algal species which are an important component of nearshore primary production rates. Marine algae supports salmon, forage fish, groundfish, Dungeness crab, and other invertebrates important to the food web that supports many wildlife species, such as resident and migratory birds, and marine mammals. It is important to provide the level of



detail at the species level in order to adequately identify and assess potential impacts of the project to species diversity and abundance. Identification of submerged aquatic vegetation will also help facilitate project review under the Cherry Point Environmental Aquatic Reserve Management Plan, which includes goals for protection of submerged aquatic vegetation.

4. The area that will be impacted by the wharf will be larger than the area that is being surveyed as part of the baseline investigation. Impacts to state-owned aquatic lands are anticipated to occur from boat traffic and scouring beyond just the absolute footprint of the wharf and trestle. Baseline data should be collected in an area surrounding the wharf and trestle in consideration of a structure of this size and the size ships that will be entering, docking, and exiting the facility. The baseline studies for impact monitoring, should include the entire area that will be monitored for impacts later to avoid having to redo the baseline.
5. The reference site shown on the baseline investigation maps is located on state owned aquatic lands, but does not appear to be part of the proposed Department of Natural Resources (DNR) leasehold. A DNR easement or right-of-entry may be necessary to protect the site from conflicting uses during the entire required monitoring period, to ensure that the site will be adequate for treatment versus control comparison purposes.